1	DICKINSON WRIGHT PLLC STEVEN A. CALOIARO		
2	Nevada Bar No. 12344 BROOKS T. WESTERGARD Nevada Bar No. 14300 scaloiaro@dickinsonwright.com bwestergard@dickinsonwright.com 100 W. Liberty Street, Suite 940 Reno, Nevada 89501 Tel.: (775) 343-7500		
3			
4			
5			
6	Fax: (844) 670-6009		
7	Attorneys for Plaintiff SATA GmbH & Co. KG		
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10	SATA GmbH & Co. KG, a German Corporation,	CASE NO.: 2:18-cv-02088-GMN-GWF	
11	Plaintiff,	STIPULATION AND [PROPOSED]	
12	v.	ORDER FOR EXTENSION OF TIME FOR PLAINTIFF TO FILE REPLY TO	
13	ZHEJIANG RONGPENG AIR TOOLS CO.,	DEFENDANT'S RESPONSE TO MOTION FOR PRELIMINARY	
14	LTD dba AEROPRO, a foreign entity	INJUNCTION [SECOND REQUEST]	
1		1	
15	Defendant.		
15 16		GmbH & Co. KG ("Plaintiff") filed its Verified	
	On October 31, 2018, Plaintiff SATA (,	
16	On October 31, 2018, Plaintiff SATA (,	
16 17	On October 31, 2018, Plaintiff SATA (Complaint (ECF No. 1) and its Emergency Ex Pareliminary Injunction (ECF Nos. 2 & 3).	GmbH & Co. KG ("Plaintiff") filed its Verified arte Motion for Temporary Restraining Order and ed its Temporary Restraining Order and Seizure	
16 17 18	On October 31, 2018, Plaintiff SATA (Complaint (ECF No. 1) and its Emergency Ex Pareliminary Injunction (ECF Nos. 2 & 3).	arte Motion for Temporary Restraining Order and	
16 17 18 19	On October 31, 2018, Plaintiff SATA (Complaint (ECF No. 1) and its Emergency Ex Pareliminary Injunction (ECF Nos. 2 & 3). On November 1, 2018, this Court entered Order (ECF No. 8).	arte Motion for Temporary Restraining Order and ed its Temporary Restraining Order and Seizure	
16 17 18 19 20	On October 31, 2018, Plaintiff SATA (Complaint (ECF No. 1) and its Emergency Ex Pareliminary Injunction (ECF Nos. 2 & 3). On November 1, 2018, this Court entered Order (ECF No. 8). On December 6, 2018, Defendant Zhejia	arte Motion for Temporary Restraining Order and	
16 17 18 19 20 21	On October 31, 2018, Plaintiff SATA (Complaint (ECF No. 1) and its Emergency Ex Pareliminary Injunction (ECF Nos. 2 & 3). On November 1, 2018, this Court entered Order (ECF No. 8). On December 6, 2018, Defendant Zhejia filed its Response to Plaintiff's Emergency Ex Pareliminary Injunction (ECF No. 8).	arte Motion for Temporary Restraining Order and ed its Temporary Restraining Order and Seizure and Rongpeng Air Tools Co., LTD ("Defendant")	
16 17 18 19 20 21 22	On October 31, 2018, Plaintiff SATA (Complaint (ECF No. 1) and its Emergency Ex Pareliminary Injunction (ECF Nos. 2 & 3). On November 1, 2018, this Court entered Order (ECF No. 8). On December 6, 2018, Defendant Zhejia filed its Response to Plaintiff's Emergency Ex Pareliminary Injunction (ECF No. 8).	ed its Temporary Restraining Order and Seizure ng Rongpeng Air Tools Co., LTD ("Defendant") arte Motion for Temporary Restraining Order and	
16 17 18 19 20 21 22 23	On October 31, 2018, Plaintiff SATA (Complaint (ECF No. 1) and its Emergency Ex Pareliminary Injunction (ECF Nos. 2 & 3). On November 1, 2018, this Court entered Order (ECF No. 8). On December 6, 2018, Defendant Zhejia filed its Response to Plaintiff's Emergency Ex Pareliminary Injunction ("Response") (ECF No. 2). Defendant's Response is December 11, 2018.	ed its Temporary Restraining Order and Seizure ng Rongpeng Air Tools Co., LTD ("Defendant") arte Motion for Temporary Restraining Order and 18). The current deadline for Plaintiff to reply to	
16 17 18 19 20 21 22 23 24	On October 31, 2018, Plaintiff SATA (Complaint (ECF No. 1) and its Emergency Ex Pareliminary Injunction (ECF Nos. 2 & 3). On November 1, 2018, this Court entered Order (ECF No. 8). On December 6, 2018, Defendant Zhejia filed its Response to Plaintiff's Emergency Ex Pareliminary Injunction ("Response") (ECF No. 2). Defendant's Response is December 11, 2018. The parties have stipulated to extend	ed its Temporary Restraining Order and Seizure ng Rongpeng Air Tools Co., LTD ("Defendant") arte Motion for Temporary Restraining Order and	
16 17 18 19 20 21 22 23 24 25	On October 31, 2018, Plaintiff SATA (Complaint (ECF No. 1) and its Emergency Ex Pareliminary Injunction (ECF Nos. 2 & 3). On November 1, 2018, this Court entered Order (ECF No. 8). On December 6, 2018, Defendant Zhejia filed its Response to Plaintiff's Emergency Ex Pareliminary Injunction ("Response") (ECF No. 2). Defendant's Response is December 11, 2018. The parties have stipulated to extend	arte Motion for Temporary Restraining Order and Seizure ed its Temporary Restraining Order and Seizure ng Rongpeng Air Tools Co., LTD ("Defendant") arte Motion for Temporary Restraining Order and 18). The current deadline for Plaintiff to reply to the deadline for Plaintiff to file its reply to due to Plaintiff counsel's previously scheduled	

1	This request is made in good faith and not for purposes of delay.	
2	DATED this 10th day of December 2018.	DATED this 10th day of December, 2018
3	DICKINSON WRIGHT PLLC	H1 LAW GROUP
4	/s//Steven A. Caloiaro	/s/ Eric D. Hone
5	STEVEN A. CALOIARO Nevada Bar No. 12344	Eric D. Hone, Nevada Bar No. 8499 eric@h1lawgroup.com
6	BROOKS T. WESTERGARD Nevada Bar No. 14300	Jamie L. Zimmerman, Nevada Bar No. 11749 jamie@h1lawgroup.com
7	scaloiaro@dickinsonwright.com bwestergard@dickinsonwright.com	Moorea L. Katz, Nevada Bar No. 12207 moorea@h1lawgroup.com
8	100 W. Liberty Street, Suite 940 Reno, Nevada 89501	701 N. Green Valley Parkway, Suite 200 Henderson NV 89074
9	Tel.: (775) 343-7500 Fax: (844) 670-6009	Phone 702-608-3720 Fax 702-608-3759
10	Attorneys for Plaintiff	ORRICK, HERRINGTON & SUTCLIFFE LLP
11	SATA GmbH & Co. KG	Ethan Ma, Illinois Bar No. 6277936 Pro Hac Vice Application to be Submitted
12		yma@orrick.com Diana Rutowski, California Bar No. 233878
13		Pro Hac Vice Application to be Submitted drutowski@orrick.com
14		1000 Marsh Road Menlo Park, CA 94025-1015
15		Phone 650-614-7400 Fax 650-614-7401
16		Attorneys for Defendant Zhejiang Rongpeng Air Tools Co., LTD dba
17		Aeropro
18	ORDER	
19	IT IS THEREFORE ORDERED that Plaintiff's reply to Defendant's Response to	
20	Plaintiff's Motion for Preliminary Injunction is due December 14, 2018 .	
21	IT IS FURTHER ORDERED that the TRO (ECF No. 8) shall be in full force and effec	
22	until the Court is able to hear arguments and make a ruling on Plaintiff's Motion for Preliminary	
23	Injunction.	
24	IT IS SO ORDERED.	
25	DATED this 12 day of December, 2018.	
26		
27		Closis M. Novarra Chief Judge
28		GlorjaM. Navarro, Chief Judge UNITED STATES DISTRICT COURT